

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**SOVEREIGN PEAK VENTURES, LLC,**

**Plaintiff,**

**v.**

**LG ELECTRONICS, INC., and  
LG ELECTRONICS U.S.A., INC.,**

**Defendants.**

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**JURY TRIAL DEMANDED**

**CIVIL ACTION NO. 2:20-CV-00107-JRG  
(CONSOLIDATED LEAD)**

**CIVIL ACTION NO. 2:20-CV-00108-JRG**

**CIVIL ACTION NO. 2:20-CV-00109-JRG**

**JOINT STIPULATION FOR DISMISSAL WITH PREJUDICE**

Plaintiff Sovereign Peak Ventures, LLC (“SPV”) and Defendants LG Electronics Inc., and LG Electronics U.S.A., Inc. (collectively, the “Parties”) have reached a settlement of all matters in controversy in the above-captioned consolidated cases. Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), the Parties hereby stipulate to the dismissal of all of their claims against one another in the above-captioned consolidated cases **WITH PREJUDICE**, subject to the terms of the settlement agreement entered between the Parties.

The Parties ask that the Court enter the attendant proposed Order of Dismissal, with each party to bear its own costs, expenses and attorneys’ fees.

Dated: November 24, 2020

Respectfully submitted,

<p><u>/s/ Patrick J. Conroy</u>  Patrick J. Conroy  Texas Bar No. 24012448  T. William Kennedy Jr.  Texas Bar No. 24055771  Daniel F. Olejko  Texas Bar No. 24108897  Jonathan H. Rastegar  Texas Bar No. 24064043  Jerry D. Tice II  Texas Bar No. 24093263  Hunter S. Palmer  Texas Bar No. 24080748</p> <p><b>BRAGALONE CONROY PC</b>  2200 Ross Avenue  Suite 4500W  Dallas, TX 75201  Tel: (214) 785-6670  Fax: (214) 785-6680  pconroy@bcpc-law.com  bkennedy@bcpc-law.com  dolejko@bcpc-law.com  jrastegar@bcpc-law.com  jtice@bcpc-law.com  hpalmer@bcpc-law.com</p> <p><b><i>Attorneys for Sovereign Peak Ventures, LLC</i></b></p>	<p><u>/s/ Allan A. Kassenoff with permission</u>  Melissa R. Smith  Andrew T. Gorham  GILLAM &amp; SMITH, LLP  303 South Washington Avenue  Marshall, TX 75670  Telephone: (903) 934-8450  Facsimile: (903) 934-9257  Email: melissa@gillamsmithlaw.com  Email: tom@gillamsmithlaw.com</p> <p>Richard A. Edlin  Allan A. Kassenoff  Elana B. Araj  GREENBERG TRAUIG, LLP  MetLife Building, 200 Park Avenue  New York, NY 10002  Telephone: (212) 801-9200  Facsimile: (212) 801-6400  Email: edlinr@gtlaw.com  Email: kassenoffa@gtlaw.com  Email: araje@gtlaw.com</p> <p>Vivian S. Kuo  GREENBERG TRAUIG, LLP  2101 L Street NW, Suite 1000  Washington, DC 20037  Telephone: (202) 331-3158  Email: kuov@gtlaw.com</p> <p>Andrew R. Sommer  GREENBERG TRAUIG, LLP  1750 Tysons Boulevard, Suite 1000  McLean, VA 22102  Telephone: (703) 749-1370  Email: sommera@gtlaw.com</p> <p><b><i>Attorneys for Defendants LG Electronics Inc. and LG Electronics USA, Inc.</i></b></p>
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**CERTIFICATE OF SERVICE**

I certify that on November 24, 2020, the foregoing document was served on counsel of record via email.

/s/ Patrick J. Conroy  
Patrick J. Conroy